



DEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES  
**DIVISION OF ENVIRONMENTAL PROTECTION**

1304 Goose Run Road  
Fairmont, WV 26554-1390

Gaston Caperton  
Governor

John M. Ranson  
Cabinet Secretary

David C. Callaghan  
Director

Ann A. Spaner  
Deputy Director

April 12, 1994

**CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Certified # Z 121 400 740

Wheeling Corrugating Company  
Beech Bottom Plant  
Beech Bottom, WV 26030  
Attention: Jim Howell

Dear Mr. Howell:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI) Report** completed on your facility by representatives of the Chief from the Office of Waste Management. This report is based on the inspection conducted on February 22, 1994.

Accompanying this report you will find a **Notice of Violation (NOV)** for those violations detected during the course of this inspection. A copy of this NOV has been forwarded for penalty calculations by the Assessment Officer. In addition, the Civil and Administrative Enforcement Unit of this Office and the United States Environmental Protection Agency have been notified so that these violations have become a permanent addition to the compliance history of this facility.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or the attached report, please feel free to contact this office at (304) 367-2724.

Sincerely,

Stanley J. Moskal  
Inspector Supervisor - Northern Unit  
Compliance Monitoring/Enforcement  
Office of Waste Management

SJM:st

Enclosures

cc: Assessment Office for Civil Penalties  
Jeanne Sofield, U.S. EPA Region III  
Civil and Administrative Enforcement Unit  
Pamela S. Lyons, Inspector  
RCRA File  
CME File, Charleston

# EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number		Handler Type		Date Submitted
WV 000797720		LDF[ ] TSF[ ] INC[ ] LQG[X] SQG[ ] TRA[ ]		
Handler Name: Wheeling Corrugating (Div. of Wheeling Pittsburgh Steel Corp.) Beech Bottom				
Street: Route 2		City: Beech Bottom, WV 26030		

EVALUATION	Add <input checked="" type="checkbox"/>	Change	Delete
Date	Number	Agency	Type
02294		S	C E I
Reason	Branch	Person	
	C M	P S L	

## AREAS OF EVALUATION ( E - Evaluated NE - Not Evaluated NA - Not Applicable )

GER	GPT	TGR	DCH	DGW	DMC	DPP	CAS
E V	E V						
GGR	GRR	TMR	DCL	DIN	DMR	DSI	FEA
E V	E V						
GLB	GSC	TOR	DCP	DLB	DOR	DTR	CSS
E V							
GMR	GSQ	TRR	DFR	DLF	DOT	DTT	
E V							
GOR	GEX	TWD	DGS	DLT	DPB	DWP	

Comments

## OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION	Add <input checked="" type="checkbox"/>	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type
S		G P T	I	S R
Regulation Citation: 40 CFR 265.173.a refer 47 CSR 35.6.3.5.c.1.				
Date Determined	Priority	Branch	Person	Returned to Compliance
02294	4	C M	P S L	Scheduled Actual
031094				
Comments: Satellite Accumulation Drum - Open Drums				

VIOLATION	Add <input checked="" type="checkbox"/>	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type
S		G P T	I	S R
Regulation Citation: 47 CSR 35-6.3.5.c.1.B				
Date Determined	Priority	Branch	Person	Returned to Compliance
02294	4	C M	P S L	Scheduled Actual
031094				
Comments: Satellite Accumulation - Drum not marked with words "Hazardous Waste"				

☐ Not Required by EPA ☐ Required only for previously reported data ☐ Required if pertinent

## INSPECTION FACT SHEET

COMPANY NAME: Wheeling Corrugating Company  
(Division of Wheeling-Pittsburgh Steel)

I.D.#: WVD000797720

MAILING ADDRESS: Beech Bottom Plant  
Beech Bottom, West Virginia 26030

TYPE OF FACILITY: Large  
Quantity Generator

LOCATION: Route 2  
Beech Bottom, WV

COUNTY: Brooke (009)

COMPANY CONTACT: Jim Howell

HANDLING CODES: S01

PHONE: (304) 234-4223

PURPOSE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E;  
West Virginia Administrative Regulations for Chapter 20-5E;  
and/or 40 CFR Parts 260 thru 268

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

D001 F003

D005 F005

D006

D007

D008

D018

D035

D039

\_\_\_ DETERMINATION PENDING

\_\_\_ NOT APPLICABLE

XX VIOLATIONS

\_\_\_ NO VIOLATIONS

DATE INSPECTED: February 22, 1994

INSPECTOR: (1) Pamela S. Lyons, West Virginia Division of Environmental Protection  
Office of Waste Management, Wheeling Field Office

(2) James A. Gaston, West Virginia Division of Environmental Protection,  
Office of Waste Management, Wheeling Field Office

(3) Mark Kees, West Virginia Division of Environmental Protection,  
Office of Waste Management, Charleston

DATE PREPARED: February 25, 1994

PREPARED BY: Pamela S. Lyons, Office of Waste Management

## COMPLIANCE EVALUATION INSPECTION

RE: Wheeling Corrugating Company, Beech Bottom  
(Division of Wheeling Pittsburgh Steel Corporation) WVD000797720

DATE INSPECTED: February 22, 1994

INSPECTORS: Pamela S. Lyons, West Virginia Division of Environmental Protection,  
Office of Waste Management, Wheeling Field Office

James A. Gaston, West Virginia Division of Environmental Protection,  
Office of Waste Management, Wheeling Field Office

Mark Kees, West Virginia Division of Environmental Protection,  
Office of Waste Management, Charleston

DATE PREPARED: February 25, 1994

PREPARED BY: Pamela S. Lyons, Office of Waste Management

On February 22, 1994 at approximately 09:25 hours the above referenced inspectors conducted a Compliance Evaluation Inspection of the Wheeling Corrugating Company, Beech Bottom. Wheeling Corrugating Company is a Division of Wheeling Pittsburgh Steel Corporation. Upon our arrival we were met by Jim Howell, who had not previously been advised of our intention to inspect the facility.

Upon presentation of the appropriate credentials, the company official was informed of our authority as representatives of the Chief of the Office of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified by Section 3007(a) of the Resource Conservation and Recovery Act; and Mr. Howell acknowledged our authority. The company official was informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

This facility manufactures corrugated steel from coiled steel. It also coats coiled steel with primer and finish paint prior to it being corrugated at this facility and other Wheeling Pittsburgh Steel's corrugating plants. Some galvanized rolls are corrugated only. This facility is considered in the hazardous waste category for Large Quantity Generators.

The hazardous waste generated at this facility is from these sources: Used paint rags from the paint line (listed for D001-Ignitable, D005-Barium, D006-Cadmium, D007-Chromium, D008-Lead, and F005/D035-Methyl Ethyl Ketone, used as a solvent); waste petroleum naptha from parts cleaners (D001 - Ignitable, D018- Benzene, D039-Tetrachloroethylene); chrome contaminated waste from periodic cleanup (D007-Chromium); waste solvents from paint operation (D001-Ignitable; F003-Spent Xylene used as a solvent, and F005-Spent Toluene used as a solvent); and a one-time waste generation of gasoline from an UST closure (D001-Ignitable and D018-Benzene).

CEI (Wheeling Corrugating Company)

February 25, 1994

Page two

Waste streams that are no longer "hazardous" are the wastewater treatment sludge and the roll grindings. The wastewater treatment sludge was previously listed for chromium (D007). Prior to the last CEI (January 7, 1992), the analysis conducted on the wastewater treatment sludge had below levels of heavy metals. The roll grindings had been hazardous waste due to the lead (D008). The lead was contained in the adhesive of the rubber, which cover the rolls along the process line. Mr. Howell contacted the companies that re-coat the rolls with rubber to have a no-lead containing adhesive used in the re-coating process. All of the rolls of the facility were re-coated with the no-lead adhesive, in order that this waste stream be eliminated. Mr. Howell is to send this inspector a copy of his letter to the contracted companies and their response/confirmation.

The used paint rags and filters go to Ecolotec, Inc., in Dayton, Ohio for disposal by incineration, as do the waste paint and contaminated chrome waste. Michigan Recovery Systems, Inc., of Romulus, Michigan accepts the waste solvent from approximately seven (7) parts cleaners throughout the facility on a three (3) week schedule. The generated waste from the UST closure was a one-time event and was sent to Petromax, Ltd., of Carnegie, Pennsylvania.

The facility inspection began at the Hazardous Waste Storage Building (i.e., Building 15-see plant layout-Attachment B). Waste oil and the containers of used paint rags are stored in this building. There were eight (8) drums of hazardous waste in storage at the time of our inspection. The drums were numbered to assist in the tracking system set up at this site. Drum #203 contained paint rags and was dated "11-23-93."

The Storage Building was in better shape than at the time of the last inspection. The oil drums were in rows of two (2) with aisle space between each row. The hazardous waste drums were in a single row. Oil was noted around the oil drums and on top of some of the drums. Mr. Howell explained that there is no heat in Building 15. So during the very cold weather in January, some oil drums froze and expanded. Some of the freezing drums had developed leaks. Floor dry was used as a sorbent over most of the floor.

Jim Howell stated that the hazardous waste transporter was scheduled to pick up the accumulated drums on the day following the inspection (2-23-94). Mr. Howell had made these arrangements due to the threat of a union strike to start at the facility at the end of the week. He had stated that Drum #203 was dated wrong due to the fact that he had shipped out a load after that date. He assumes that an employee dated a drum at the satellite accumulation area when accumulation began. (Satellite accumulation is different than the Storage Building.)

On February 23rd, this inspector contacted Mr. Howell to clarify the waste streams and the hazardous waste codes assigned. Mr. Howell informed this inspector that the drums of hazardous waste were picked up by the transporter that morning.

After viewing the Hazardous Waste Storage Building, the plant operation was viewed. The paint lines were viewed, with the hazardous waste generation points noted. The paint line process is as follows: The steel coil is unwound, then runs through tension. The coil then goes through the cleaning tank. For galvanized coils, zinc phosphate is also added to the cleaning mixture. Once cleaned, the coil is prep-coated with chromium solution and dried. Then a primer coat is applied onto both sides of the coil. It is dried again prior to the finish coat being applied. After the finished coat, it is dried and recoiled.

While at the chromium application station, a drum labeled as containing hazardous waste was noted (see photo #1). Mr. Howell explained that the facility recycles the bulk of their chrome waste, but periodically the chrome application station needs cleaned out. The drum contained approximately two (2) inches of chromium waste from the last cleanup. According to Mr. Howell, the drum is stored in the Satellite Accumulation Storage Room until a cleanup is needed. At the time of our inspection, there were no workers at the chrome application station. The drum ring was on the floor near the drum. Since this drum is a satellite accumulation drum, there is no accumulation date required until the drum is filled. According to Mr. Howell, there are approximately four (4) drums of this chrome clean-up waste generated per year.

At the Primer Coating paint room, a drum of accumulating used paint rags was noted. The drum was not marked as "hazardous waste" nor was the contents noted. Also, the drum ring was not secured on the drum (see photo #2).

According to Mr. Howell, the S.O.P. for handling of used paint rags is: the used paint rags are to be taken to the Satellite Accumulation Storage Room at least once during the turn. In this room, a drum that contains a drain basket is located. The paint room operators are to place the used paint rags in the drain basket and replace the lid. The solvent drains out of the rags and into the bottom of the drum. The accumulated solvent is reused for cleaning the paint rooms and Satellite Accumulation Room. Once the satellite accumulation drum of used paint rags is full, the drum is painted black and then labeled and dated. It is then moved out to the Hazardous Waste Storage Building.

The used solvent is stored in the paint storage room until it is reused. Mr. Howell stated that it is stored there since that room has a sprinkler system. When the used solvent becomes spent, Mr. Howell will declare it waste and the drums labeled and dated.

Photo #3 shows the drain drum and satellite accumulation drum in the Satellite Accumulation Room. The satellite accumulation drum was not closed (i.e., the drum ring is not on). Both of the drums were labeled but not dated. The drain drum should not have been labeled. Photo #4 shows a third (3rd) drum in the Satellite Accumulation Room. It was labeled

but not dated. According to Mr. Howell and an area supervisor, this drum contained the used solvent, which was to be reused. After discussing the regulations of satellite accumulation and clarification of the procedure in practice, Mr. Howell removed the incorrect labels off the drain drum and used solvent drum. It was noted that S.O.P.s for the Satellite Accumulation Room drum handling were posted on the wall inside of the Satellite Accumulation Room.

The Finish Coat paint room was adjacent to the Satellite Accumulation Room. There were no drums of accumulating used paint rags present.

One of the parts cleaners located throughout the facility was viewed. Safety-Kleen maintains the parts cleaners on a three (3) week schedule. No extra drums of Safety-Kleen's solvent are left on-site. The only person handling this waste stream is to be the Safety-Kleen employee.

The above mentioned OWM employees went to Mr. Howell's office to view the records. One change in the record keeping has been that Mr. Howell has been keeping all of the records on-site, since January 1993. In the past, the original records were kept at the Wheeling Pittsburgh Steel's Corporate Office in Wheeling.

The hazardous waste manifests for 1993 and 1994 were viewed. See Attachments C, D, E and F - representative examples of manifests. The manifests with Land Disposal Restriction Forms were found in order. Note: Attachment F represents hazardous waste generated from a gasoline UST closure. Attachment E represents a shipment to Safety-Kleen's New Castle, Kentucky site. Mr. Howell stated that this waste was generated during a special cleanup of the paint line when some of the old machinery was moved.

The facility conducted its annual hazardous waste training for 1993 on November 17th. See Attachment G - the sign-in sheet and proposed attendees from the Beech Bottom plant. Clean Harbors conducted the training for Wheeling Pittsburgh Steel employees in the upper Ohio Valley region during a two (2) week period.

A copy of the Contingency Plan was requested to be viewed. The ring binder presented contained the BMP, SPCC, MSDSs, RCRA Contingency Plan and other documents. The 1992 revision of the Contingency Plan is Attachment H. The Contingency Plan does not include all of the required information of all emergency equipment or for the evacuation plan. The Contingency Plan has not been amended to reflect a change in the list of emergency coordinators. The facility has a new plant manager (Dave Kerns) as of January 1994. The Plan is focused on the Hazardous Waste Storage Building (i.e., Building 15). It does not address the Satellite Accumulation Room, or the Paint Storage Room where the waste solvent would be stored. The Contingency Plan needs to reflect the generation/accumulation and storage sites for spill, fire and evacuation procedures.

Under the Preparedness and Prevention Requirements in Subpart C of 40 CFR 265 and the Contingency Plan Regulations, the arrangements made with local authorities need to be better clarified. The primary emergency responder needs to be designated for the police and fire departments. Also, which of the local hospitals have been familiarized with the properties of the hazardous waste handled at the facility and types of injuries or illness could result from fires, explosions or release at the facility.

After a brief exit discussion, the above mentioned OWM employees thanked Mr. Howell for his cooperation and departed.

### VIOLATIONS

1. This facility did not maintain containers holding hazardous waste as a closed container during storage. Waste was not being added or removed from the drum at the time of the violations being noted at the Primer Coat Paint Room, by the Chromium Application Station prior to cleanup activities, and at the Satellite Accumulation Room. These incidents are in violation of 40 CFR 265.173(a) as referenced by 47 CSR 35-6.3.5.c.1.A.
2. This facility did not have a drum containing hazardous waste (used paint rags) marked with the words hazardous waste or noting the contents. This drum was located in the Primer Coat Paint Room, in violation of 47 CSR 35-6.3.5.c.1.B.
3. The facility's Contingency Plan did not include all of the required information for all of the emergency equipment. The emergency equipment is to include the fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The Plan must include the location and physical description of each item on the list and a brief outline of its capabilities. This is according to 40 CFR 265.52.e. as referenced by 47 CSR 35-6.3.5.a.5.
4. The evacuation plan in the Contingency Plan for this facility does not address the generation and satellite accumulation/storage sites nor describes the signal(s) to be used to begin evacuation or the evacuation routes to be used. This is required in 40 CFR 265.52.f. as referenced in 47 CSR 35-6.3.5.a.5.

CEI (Wheeling Corrugating Company)

February 25, 1994

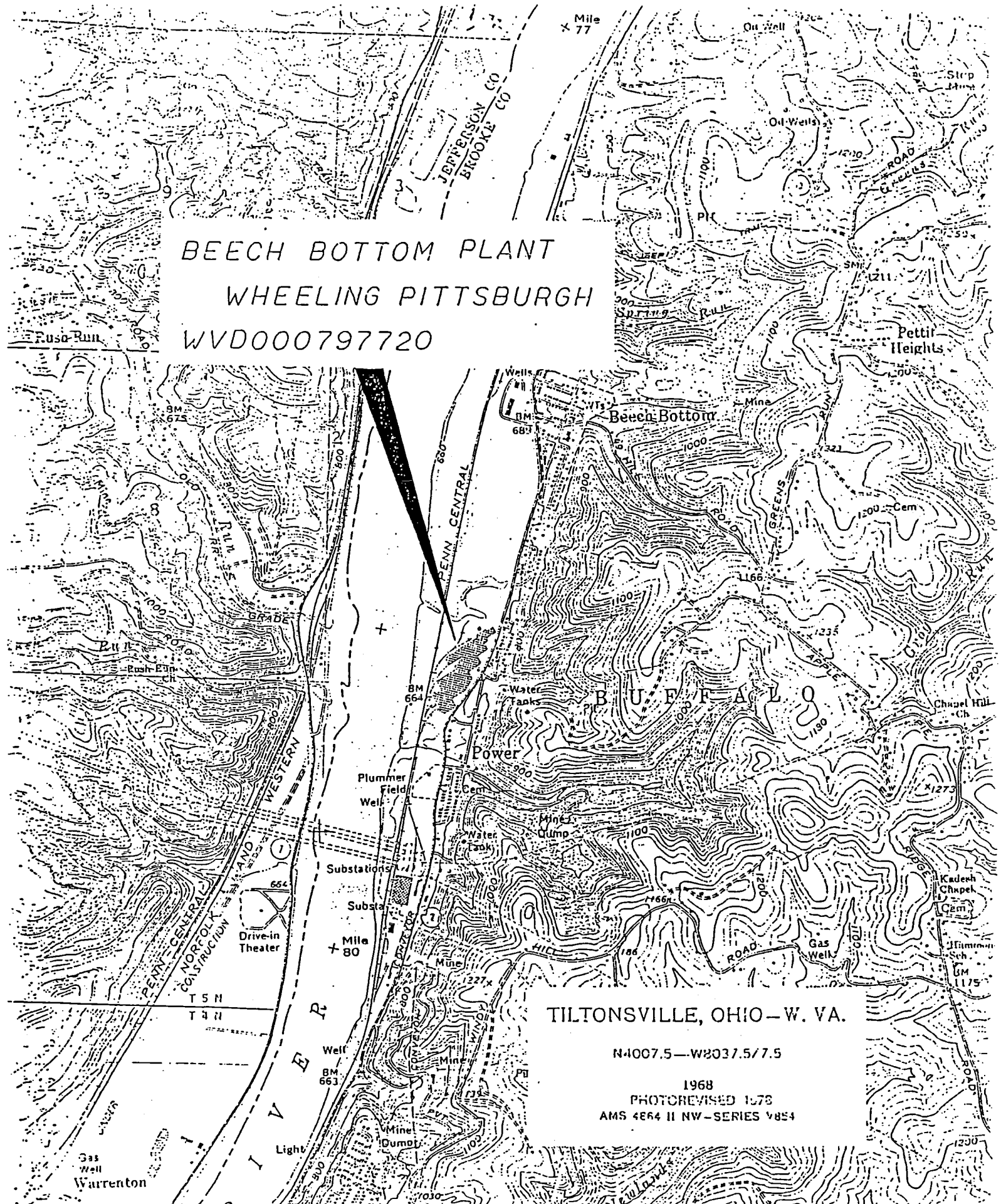
Page Six

5. The arrangements with local authorities that would respond to an emergency at this facility are not clearly defined as is required in 40 CFR 265.37 and 40 CFR 265.52.c. as is referenced by 47 CSR 35-6.3.5.a.5.

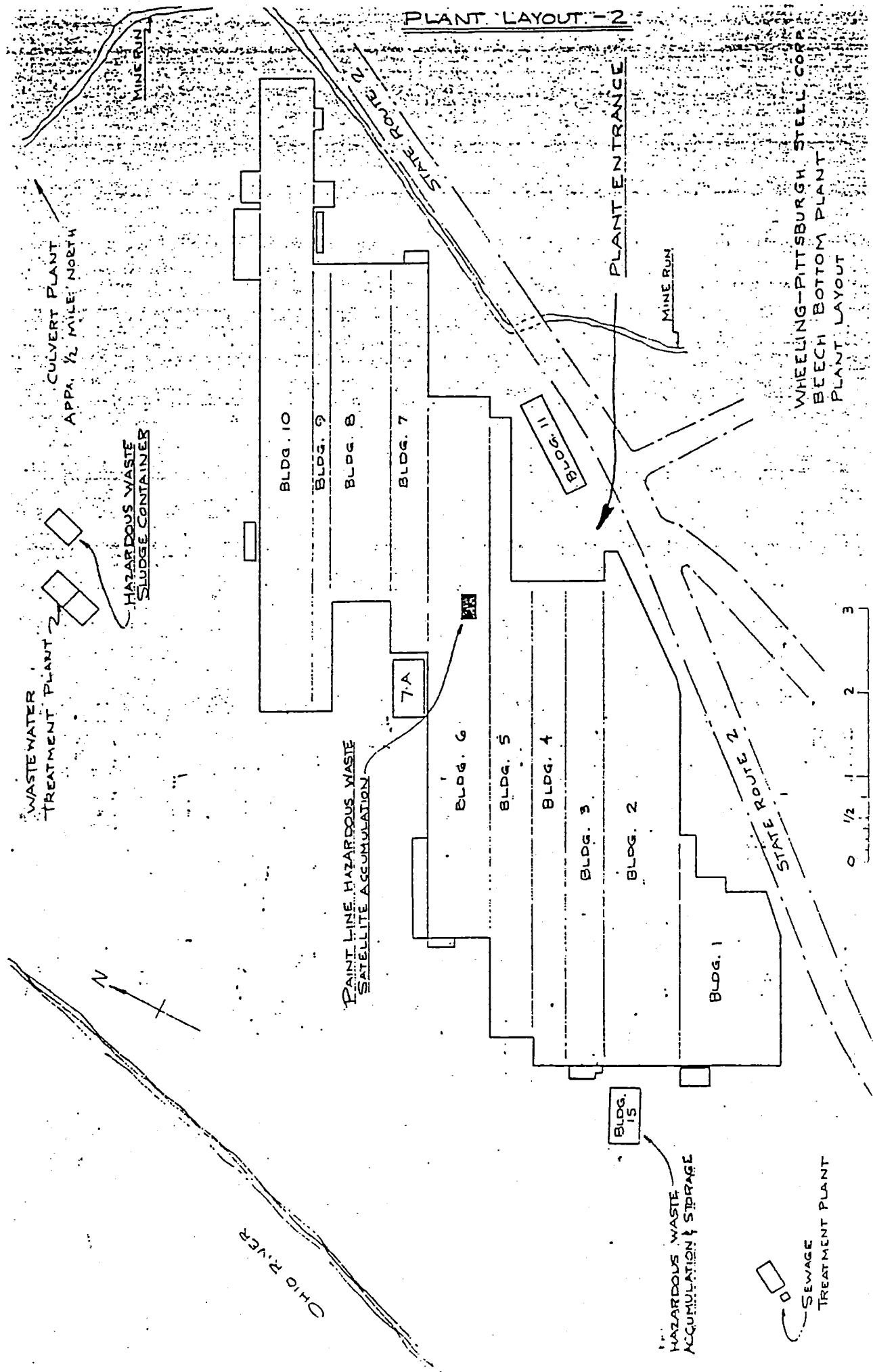
### **CONCLUSION**

The above noted violations will be addressed by a notice of Violation. Violations #1 and #2 are to be referred to the Enforcement Section. Violations #3-5 are to be addressed by the facility within the time frame noted on the Notice of Violation or other enforcement actions may be pursued.

BEECH BOTTOM PLANT  
WHEELING PITTSBURGH  
WVD000797720



PLANT LAYOUT - 2



WHEELING-PITTSBURGH STEEL CORP.  
BEECH BOTTOM PLANT  
PLANT LAYOUT

## PHOTO LOG

Facility Name: *Wheeling Corrugating Company (Div. of Wheeling Pittsburgh)*

Location: *Beech Bottom, WV*

[illegible]

Film Description: *Kodacolor 200*

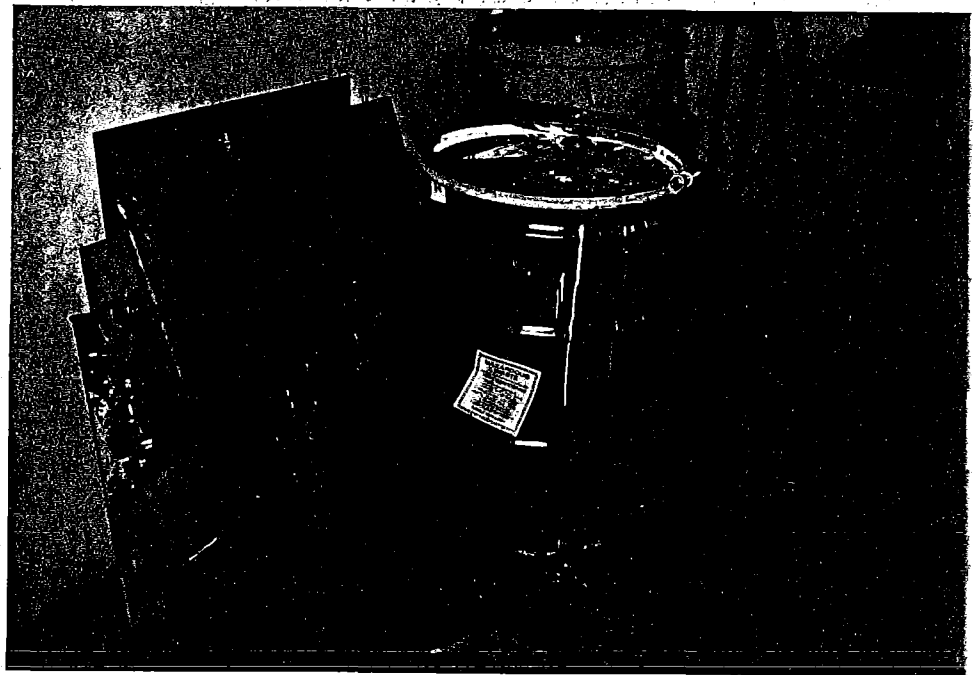
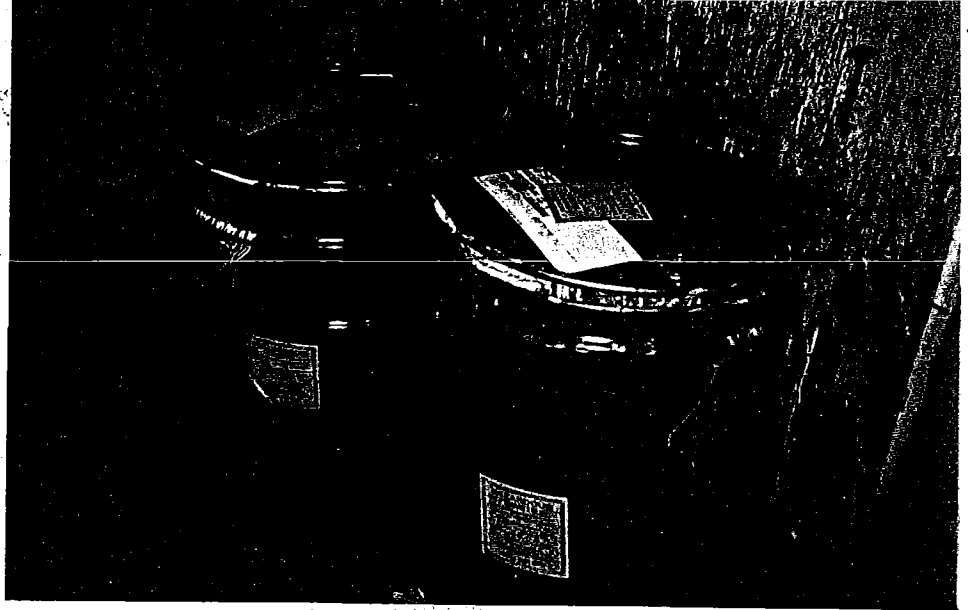
Focal Length of Lens: \_\_\_\_\_

Date Photos Taken: *February 22, 1994*

Photographer: Pamela S. Lyons

Developer: *Kramers Photo Supply, Inc.*

Log Prepared By: Pamela S. Lyons





Gaston Caperton  
Governor

DEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES

DIVISION OF ENVIRONMENTAL PROTECTION

Office of Waste Management

David C. Callaghan  
Director

John M. Flanson  
Cabinet Secretary

Ann A. Spaner  
Deputy Director

**NOTICE OF VIOLATION**

DATE: February 22, 1994

TIME: 09:25

ISSUED TO: Wheeling Corrugating Company (Division of Wheeling Pittsburgh Steel Corporation)

EPA ID#: WVD000797720

FACILITY MAILING ADDRESS: Beech Bottom Plant, Beech Bottom, WV 26030

FACILITY REPRESENTATIVE: Jim Howell

On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 20, Article 5E and/or an Order or Permit issued pursuant to §20-5E. During that inspection the following violation(s) were noted:

- #3 1. A. (Regulation) 40 CFR 265.52.e as referenced by 47 CSR 35-6.3.5.a.5  
B. (Facts) This facility's Contingency Plan does not include all of the required information for all of the emergency equipment, including location, capabilities & description.
- #4 2. A. 40 CFR 265.52.f as referenced by 47 CSR 35-6.3.5.a.5  
B. This facility's Contingency Plan's Evacuation Plan does not address the generation and satellite accumulation sites nor describes the evacuation signal(s) to be used.
- #5 3. A. 40 CFR 265.37 & 265.52.c as referenced by 47 CSR 35 - 6.3.5.a.5  
B. The arrangements with local authorities which would respond to an emergency situation at this facility is not clearly defined.

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions:

This facility must comply with the West Virginia Hazardous Waste Management Regulations. The Contingency Plan needs to be revised to show the accurate Emergency Coordinators; the complete information of the emergency equipment; the expanded details of the evacuation plan to include the generation & satellite accumulation sites and the signals used to begin an evacuation; and clarify / document the arrangements made with local authorities.  
By May 1, 1994, this facility is to send the revised Contingency Plan to this inspector to the Wheeling Field Office (303 Methodist Building, Wheeling, WV 26003). Violations # 1 & #2 are addressed on Page 1 of this Notice of Violation.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §20-5E-16(a).

Field Office  
District Phone: (304) 238-1075

Fax: (304) 238-1006

Issued By: [Signature]

Title: Environmental Inspector



Gaston Caperton  
Governor

John M. Ranson  
Cabinet Secretary

## DEPARTMENT OF COMMERCE, LABOR &amp; ENVIRONMENTAL RESOURCES

## DIVISION OF ENVIRONMENTAL PROTECTION

Office of Waste Management

David C. Callaghan  
Director

Ann A. Spaner  
Deputy Director

**NOTICE OF VIOLATION**DATE: February 22, 1994TIME: 09:25ISSUED TO: Wheeling Corrugating Company (Division of Wheeling Pittsburgh Steel Corporation)EPA ID#: WVD000797720FACILITY MAILING ADDRESS: Beech Bottom Plant, Beech Bottom, WV 26030FACILITY REPRESENTATIVE: Jim Howell

On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 20, Article 5E and/or an Order or Permit issued pursuant to §20-5E. During that inspection the following violation(s) were noted:

1. A. (Regulation) 40 CFR 265.173(a) as referenced by 47 CSR 35 - 6.3.5.c.1.A  
B. (Facts) This facility does not maintain drums of hazardous waste as a closed container during storage. Waste was not being added or removed at the time of violations noted.
2. A. 47 CSR 35-6.3.5.c.1.B  
B. A drum containing hazardous waste was not marked with the words "Hazardous Waste" or noting the contents.

XXXXXX See Page ~~2~~ 2 for violations concerning the Contingency Plan.

3. A.

XB.

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions:

This facility must comply with the West Virginia Hazardous Waste Management Regulations.

Regarding the above two mentioned violations, this facility is to correct these violations by March 10, 1994. Drums of hazardous waste when in storage or satellite accumulation are to be kept closed (i.e., drum ring on and tighten down) except when waste is being removed or added. Drums containing hazardous waste must be marked as such or with the contents noted. This facility is to document the actions taken to correct the violations and send a copy of the documentation to the Wheeling Field Office. The address is: WV DEP OWM; Wheeling Field Office, 303 Methodist Building, Wheeling, WV 26003 Attention: Pam Lyons.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §20-5E-16(a).

Field Office  
District Phone: (304) 238-1075

Fax: (304) 238-1006Issued By: Title: Environmental Inspector  
ENV

Division of Environmental Protection  
Office of Waste Management

Civil Administrative Penalty  
Referral Form

Facility: Wheeling Corrugating Company (Div. of Wheeling-Pittsburgh)  
Location: Beech Bottom, WV  
EPA Id #: WVD000797720  
Citation: 47 CSR 35-6.3.5.c.1.B  
Date of NOV: February 22, 1994

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I) Deviation from Requirements

- (1-3) 2 The violator had completed nearly all requirements in question. However, there were some aspects of the requirement which were clearly not accomplished. Or, the requirement was complete in most, but not all, areas of the facility.
- (4-6)        The violator had completed approximately one-half of the requirement of the regulation in question. Or, the requirement was completed in approximately one-half of the areas of the facility.
- (7-9)        The violator has completed almost none of the requirements of the regulation in question. However, some aspects of the requirements clearly were accomplished. Or, the requirement was incomplete in most but not all areas of the facility.
- (10)        The violator had not completed any of the requirements of the regulation in question. Or, the requirement was incomplete in all areas of the facility.

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II) Potential for Harm

- (1-3) 3 Violation is of an administrative nature and could not result in a potential for harm to human health or the environment.
- (4-6)        Violation is of an administrative or physical nature and may result in a minor potential for harm to human health or the environment.
- (7-9)        Violation is of administrative or physical nature and may result in a moderate potential for harm to human health or the environment.
- (10)        Violation is of an administrative or physical nature and may result in a major potential for harm to human health or the environment.

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Complete the back of this page.

Division of Environmental Protection  
Office of Waste Management

Civil Administrative Penalty  
Referral Form

Facility: Wheeling Corrugating Company (Div. of Wheeling-Pittsburgh)  
Location: Beech Bottom, WV  
EPA Id #: WVD000797720  
Citation: 40 CFR 265.173(a) as referenced 47 CSR 35-6.3.5.c.1.A  
Date of NOV: February 22, 1994

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I) Deviation from Requirements

- (1-3)        The violator had completed nearly all requirements in question. However, there were some aspects of the requirement which were clearly not accomplished. Or, the requirement was complete in most, but not all, areas of the facility.
- (4-6)   4   The violator had completed approximately one-half of the requirement of the regulation in question. Or, the requirement was completed in approximately one-half of the areas of the facility.
- (7-9)        The violator has completed almost none of the requirements of the regulation in question. However, some aspects of the requirements clearly were accomplished. Or, the requirement was incomplete in most but not all areas of the facility.
- (10)        The violator had not completed any of the requirements of the regulation in question. Or, the requirement was incomplete in all areas of the facility.
- 

II) Potential for Harm

- (1-3)   3   Violation is an administrative nature and could not result in a potential for harm to human health or the environment.
- (4-6)        Violation is of an administrative or physical nature and may result in a minor potential for harm to human health or the environment.
- (7-9)        Violation is of administrative or physical nature and may result in a moderate potential for harm to human health or the environment.
- (10)        Violation is of an administrative or physical nature and may result in a major potential for harm to human health or the environment.
- 

Complete the back of this page.

MICHIGAN DEPARTMENT  
OF NATURAL RESOURCESDO NOT WRITE IN THIS SPACE  
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐Failure to file is punishable under  
Section 299.548 MCL or Section 10 of  
Act 398, P.A. 1989.

Please print or type.

Form Approved OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS  
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest  
Document No.

2. Page 1

Information in the shaded areas  
is not required by Federal  
law.

3. Generator's Name and Mailing Address

WHEELING-PITTSBURGH STEEL CORP.  
ROUTE 2, BEECH BOTTOM, WV 26030

A. State Manifest Document Number

MI 2469026

4. Generator's Phone (304) 234-7628

B. State Generator's ID

5. Transporter 1 Company Name

DRUKY BROTHERS INC.

6. US EPA ID Number

MI D056988892

C. State Transporter's ID

D. Transporter's Phone 313-9623224

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

MICHIGAN RECOVERY SYSTEMS INC.  
36345 VAN BORN ROAD  
ROMULUS, MICH. 48174

10. US EPA ID Number

MI D060975844

G. State Facility's ID

H. Facility's Phone

313-326-3100

11. US DOT Description (including Proper Shipping Name, Hazard Class, and  
HM ID NUMBER).

12. Containers

13. Total  
Quantity14. Unit  
M/Vol1. Waste  
No.

NIH

a. **I** **RQ, Waste Paint Related Material (Xylene, Toluene)**  
**Class 3, UN 1263 PG II (RQ 1001b)**

No.

Type

0 8 0 0

0 4 0 0 0

G

7 0 0 5

b.

No.

Type

0 0 0 0

0 0 0 0

G

7 0 0 3

c.

No.

Type

0 0 0 0

0 0 0 0

G

7 0 0 3

d.

No.

Type

0 0 0 0

0 0 0 0

G

7 0 0 3

J. Additional Descriptions for Materials Listed Above

11a. RQ 100 LB (7003, 7005, 0001)

MRSI APPROVAL # 050542 D

IF UNDELIVERABLE: return to generator

HAZARDOUS WASTE RESTRICTED FROM LAND DISPOSAL UNDER 40 CFR 268

K. Handling Codes for Wastes  
Listed Above

a/ 11

b/ 11

c/ 11

d/ 11

15. Special Handling Instructions and Additional Information

LAND DISPOSAL RESTRICTION FORMS ATTACHED ERG #27 attached 24hour emergency # 304-234-7628

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by  
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway  
according to applicable international and national government regulations.If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined  
to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the  
present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste  
generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in  
Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

21. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in  
Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

22. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in  
Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

23. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in  
Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

24. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in  
Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

25. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in  
Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

26. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in  
Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

27. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in  
Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

## MICHIGAN RECOVERY SYSTEMS, INC.

Generator WHEELING PITTSBURGH STEEL CORP  
 Manifest Doc. #: 69026  
 Manifest Line Item #: KX11a. ( )11b. ( )11c. ( )11d.

EPA I.D.#: WVD 000 797 720  
 EPA Waste Code: F003, F005, D001

Notification of Hazardous Waste Restricted from Land Disposal  
 F001-F005 Solvent Wastes

Wastes which do not meet treatment standards: Notification from generator to disposal facility [40 CFR 268.7(a)(1)(i)]

The wastes identified on the above mentioned manifest and bearing the above mentioned EPA Hazardous Waste Number(s) are subject to the land disposal restrictions of 40 CFR Part 268. This waste does not meet the applicable treatment standards specified in Part 268 Subpart D or exceeds the prohibitions specified in 268.32 or RCRA section 3004(d). Analytical data, where available has been previously supplied or is attached. All treatment standards or prohibition levels exceeded by the waste are checked below.

1. Applicable treatment standards from 40 CFR 268.41 (Table CCWE) or 268.42 (Tables 1 and 2) or 268.43 (Table CCW)

Hazardous Waste	Constituents of Concern	Nonwastewater		Wastewater Total Composition mg/l	Check (if applicable)
		Total Composition mg/kg	TCLP mg/l		
F001 - Spent halogenated solvents used in degreasing	Carbon tetrachloride	5.6		0.057	
	Methylene chloride	3.3		0.089	
	Tetrachloroethylene	5.6		0.056	
	1,1,1-Trichloroethane	5.6		0.054	
	Trichloroethylene	5.6		0.054	
	1,1,2-Trichloro-1,2,2-trifluoroethane	28		0.057	
	Trichlorofluoromethane	33		0.02	
F002 - Spent halogenated solvents	Chlorobenzene	5.7		0.057	
	1,2-Dichlorobenzene	6.2		0.033	
	Methylene Chloride	33		0.089	
	Tetrachloroethylene	5.6		0.056	
	1,1,1-Trichloroethane	5.6		0.054	
	1,1,2-Trichloroethane	7.6		0.03	
	Trichloroethylene	5.6		0.054	
	1,1,2-Trichloro-1,2,2-trifluoroethane	28		0.057	
F003 - Spent non-halogenated solvents	Trichlorofluoromethane	33		0.02	
	Acetone	160		0.28	
	n-Butyl alcohol	2.6		5.6	
	Cyclohexanone		0.75	0.36	
	Ethyl acetate	33		0.34	
	Ethyl benzene	5		0.057	XXXXXXX
	Ethyl ether	160		0.12	
	Methanol		0.75	5.6	
F004 - Spent non-halogenated solvents	Methyl isobutyl ketone	33		0.14	
	Xylene	28		0.32	XXXXXXX
	Cresol (m and p isomers) and Cresylic Acid	3.2		0.77	
	o-Cresol	5.6		0.11	
F005 - Spent non-halogenated solvents	Nitrobenzene	14		0.068	
	Benzene	3.7		0.07	
	Carbon disulfide		4.81	0.014	
	2-Ethoxyethanol	Incineration		Bio. Degrad. or Incin.	
	Isobutanol	170		5.6	
	Methyl ethyl ketone	35		0.28	XXXXXXX
	2-Nitropropane	Incineration		Wet Oxid. or Chem Oxid. then Carb. Adsorp./Incin.	
	Pyridine	16		0.014	XXXXXXX
	Toluene	28		0.03	XXXXXXX

**2. California List Waste**

This shipment contains hazardous waste subject to additional RCRA Section 3004(d) California List waste treatment standards.

- ( ) Liquid waste with PCB's >50 ppm  
 ( ) Liquid hazardous waste that contain halogenated organic compounds (HOC) in total concentration > or = to 1,000 mg/l or 1,000 mg/kg (nonliquids). (INCINERATION) (HOCs found in 40 CFR 268.22 Appendix III).  
 ( ) Nickel (liquid waste) >134 ppm  
 ( ) Thallium (liquid waste) >130 ppm

**3. Additional Hazardous Characteristics**

- ( ) No additional Hazardous Characteristics are exhibited by this waste which would require treatment beyond the standards described above.  
 (X) Treatment standards for the additional Hazardous Characteristics requiring treatment are indicated below

**TREATMENT STANDARDS FOR HAZARDOUS WASTE CHARACTERISTIC SUBCATEGORIES (40 CFR 268)**

Check	Hazardous Waste Subcategories	Constituents of Concern	Total Composition mg/kg	Nonwastewater TCLP mg/l	Wastewater Total Composition mg/l
XXXXXXX	D001-Ignitable Liquids		INCMR.SUBS.RORGS.		N.A.
	High -TOC nonwastewater (>10% TOC)				
	D001-Ignitable liquids		DEACT		N.A.
	Low TOC nonwastewater (<10% TOC)				
	D001-Ignitable liquids wastewater (<1% TOC <1% TSS)		N.A.		DEACT
	D001-Ignitable compressed gases		DEACT		N.A.
	D001-Ignitable reactives		DEACT		N.A.
	D001-Oxidizers		DEACT		DEACT
	D002-Acidic Corrosives		DEACT		DEACT
	D002-Alkaline corrosives		DEACT		DEACT
	D002-Other corrosives		DEACT		DEACT
	D004-Arsenic	Arsenic		5	5
	D005-Barium	Barium		100	100
	D006-Cadmium	Cadmium		1	1
	D007-Chromium	Chromium(total)		5	5
	D008-Lead	Lead		5	5
	D009-Low-mercury (<250 mg/kg total Hg)	Mercury		0.2	0.2
	D009-High-mercury (>250 mg/kg total Hg)	Mercury with organics	IMERC.RMERC		0.2
		Mercury with inorganics	RMERC		0.2
	D010-Selenium	Selenium		5.7	1
	D011-Silver	Silver		5	5
	D012-Endrin	Endrin	0.13		INCIN.BIODG
	D013-Lindane	Lindane	0.066		INCIN.CARBN
	D014-Methoxychlor	Methoxychlor	0.18		INCIN.WETOX
	D015-Toxaphene	Toxaphene	1.3		INCIN.BIODG
	D016-2,4-D	2,4-D	10		INCIN.CHOXD.BIODG
	D017-2,4,5-TP Silvex	2,4,5-TP Silvex	7.9		INCIN.CHOXD

Company Name: WHEELING PITTSBURGH STEEL CORP

Authorized Signature: George M. Manning

Date: 01-14-94

Abbreviations of technology codes from 40 CFR 268.42:

INCIN (Incineration)  
 FSUBS (Fuel substitution)  
 RORGS (Recovery of organics)  
 IMERC (Roasting/retoasting of organics)  
 RMERC (Incineration followed by  
 roasting/retoasting of ash)  
 WETOX (Wet Air Oxidation)

DEACT (Deactivation to remove the characteristic)  
 RTHRM (Thermal recovery)  
 RLEAD (Thermal recovery of lead in secondary smelters)  
 AMLGM (Amalgamation)  
 BIODG (Biodegradation)  
 CARBN (Carbon Adsorption)  
 CHOXD (Chemical Oxidation)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
		3. Generator's Name and Mailing Address		A. State Manifest Document Number		B. State Generator's ID			
WHEELING-PITTSBURGH STEEL CORP ROUTE 2, BEECH BOTTOM, WV 26030		4. Generator's Phone (304) 234-2645 OR (304) 234-7628		6. US EPA ID Number		C. State Transporter's ID		D. Transporter's Phone 304-233-6567	
		5. Transporter 1 Company Name		7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID	
SAFETY-KLEEN CORP 10 INDUSTRIAL PARK DRIVE WHEELING, WV 26002		9. Designated Facility Name and Site Address		10. US EPA ID Number		F. Transporter's Phone		G. State Facility's ID	
						H. Facility's Phone 304-233-6567			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
		No. Type							
		a. 103		1953				D001/ D018/ D039	
		b. (EPA IGNITABILITY, D001) (ERG # 27)							
		c. This shipment contains hazardous waste which is restricted or prohibited from land disposal under 40 CFR 268. This waste is destined for beneficial recycle/reclamation under 40 CFR 261.2.							
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above		S02					
15. Special Handling Instructions and Additional Information 4-145-03 IF UNDELIVERABLE RETURN TO GENERATOR 7218 EMERGENCY RESPONSE PHONE# (708)-888-4660 7372 SKOOT # 11.A 501 MANIFEST CODE BB54		NOTE: RETURN ORIGINAL TO : WHEELING-PITTSBURGH STEEL CORP RT.2 BEECH BOTTOM PLANT BEECH BOTTOM, WV 26030 ATTN: J. HOWELL							
		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name		Signature		Month		Day		Year	
DOMINIC MORANDO JR.		Dominic Morando for		10		10		94	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month		Day		Year	
DAVE MORGAN		Dave Morgan		10		10		94	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month		Day		Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name		Signature		Month		Day		Year	
SHECCA CIREO		Shecca Cireo		10		10		94	



WV 26003

**IN EVENT OF EMERGENCY CALL  
1-708-888-4660 (24 hours)**

TO: SAFETY-KLEEN CORP.  
(DESIGNATED FACILITY)EPA ID NO. 6040981034101  
(DESIGNATED FACILITY)ADDRESS: 10 INDUSTRIAL RD, WHEELING, WV 26007

Under manifest number 50161, the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR Part 268.7, the generator hereby provides notice that the waste is restricted from land disposal. A copy of this form must be kept by the generator and facility for five (5) years from the date of waste shipment.

APPROPRIATE BOXES	WASTE NAME	EPA* WASTE CODE	THE WASTE MAY CONTAIN THE FOLLOWING RESTRICTED CONSTITUENTS	TREATMENT STANDARD (mg/l) OR METHOD (FOR NON-WASTE WATER)
	<input checked="" type="checkbox"/> Waste Petroleum Naphtha (105)	D001, D018, D039.	Ignitable Liquid (High TOC subcategory) Halogenated Organic Compounds (HOC's) $\geq$ 1000 mg/l Benzene Tetrachloroethylene	Incineration (INCIN), fuel substitution (FSUBS) or recovery (RORGs) (40 CFR 268.42) (non-waste water) INCIN (40 CFR 268.42) (non-waste water) Not Established Not Established
	<input type="checkbox"/> Waste Petroleum Naphtha (140)	D001.	Ignitable Liquid (High TOC Subcategory)	INCIN, FSUBS, or RORGs (40 CFR 268.42) (non-waste water)
	<input type="checkbox"/> Waste Petroleum Naphtha (sludges from Safety-Kleen Service Center Operations)	D001, D006, D007, D008, D039.	All of the above, plus: — Cadmium — Chromium — Lead — Tetrachloroethylene	1.0 (non-waste water) 5.0 (non-waste water) 5.0 (non-waste water) Not Established
	<input type="checkbox"/> Waste Compound Cleaning Liquid/ Immersion cleaner 699	D006, D007, D008, D018, D021, D027, D039, D040.	HOC's $\geq$ 1000 mg/l — Cadmium — Chromium — Lead — Benzene — Chlorobenzene — 1, 4-Dichlorobenzene — Tetrachloroethylene — Trichloroethylene	INCIN (40 CFR 268.42) (non-waste water) 1.0 (non-waste water) 5.0 (non-waste water) 5.0 (non-waste water) Not Established Not Established Not Established Not Established
	<input type="checkbox"/> Waste Perchloroethylene	F002.	Tetrachloroethylene	5.6 (non-waste water)
	<input type="checkbox"/> Waste Perc. Filters This hazardous debris is subject to the alternative treatment standards of 40CFR 268.45.	F002.	Tetrachloroethylene	5.6 (non-waste water)
	<input type="checkbox"/> Waste Trichlorotrifluoroethane	F002.	Trichlorotrifluoroethane	28.0 (non-waste water)
	<input type="checkbox"/> Waste 1,1,1 Trichloroethane	F002.	1, 1, 1 Trichloroethane	5.6 (non-waste water)
	<input type="checkbox"/> Waste Petroleum Naphtha (Dry Cleaning)	D001, D039.	Ignitable Liquid (High TOC Subcategory) Tetrachloroethylene	INCIN, FSUBS, or RORGs (40 CFR 268.42) (non-waste water) Not Established
	<input type="checkbox"/> Waste Paint Related Material	F003, F005, F003, F005, F003, F003, D001, D006, D007, D008.	Acetone Methyl Ethyl Ketone Methyl Isobutyl Ketone Toluene Xylene Methanol Ignitable Liquid (High TOC Subcategory) Cadmium Chromium Lead (TOC Subcategory)	160.0 (non-waste water) 36.0 (non-waste water) 33.0 (non-waste water) 28.0 (non-waste water) 28.0 (non-waste water) 0.75 (non-waste water) INCIN, FSUBS, or RORGs (40 CFR 268.42) (non-waste water) 1.0 (non-waste water) 5.0 (non-waste water) 5.0 (non-waste water)
	<input type="checkbox"/> Waste Antifreeze	D008, D039.	Lead Tetrachloroethylene	5.0 (non-waste water) Not Established

The constituent composition is based on knowledge of the waste (via Material Safety Data Sheets for the chemical(s) used, and the process which created the waste).

\* These treatment standards do not preclude reclamation prior to final disposition.

Generator Company: WILK B LINDA PITTS STEEL EPA ID NO: WV0000075723

Generator's Signature

Date:

1-6-97

Printed Name and Title of Generator

Dominick Morando Jr

Safety-Kleen Corp. manages the above waste through its recycling and fuels programs in accordance with all applicable elements of the land disposal restrictions.

PATROLMAN

GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. WVD 000797720		Manifest Document No. 66574		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address WHEELING PITTSBURGH STEEL 2 RT 2 BEECH BOTTOM 4. Generator's Phone (304) 234-4223 WV 26030						A. State Manifest Document Number							
5. Transporter 1 Company Name SAFETY KLEEN CORP						B. State Generator's ID							
6. US EPA ID Number ILD 984908202						C. State Transporter's ID							
7. Transporter 2 Company Name						D. Transporter's Phone (304) 233-6567							
8. US EPA ID Number						E. State Transporter's ID							
9. Designated Facility Name and Site Address SAFETY KLEEN CORP STATE HWY 146 NEW CASTLE, KY 40050						F. Transporter's Phone							
10. US EPA ID Number KYD 053348108						G. State Facility's ID							
H. Facility's Phone 502-845-2453													
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total		14. Unit		15. Waste No.	
						No. Type		Quantity		Wt/Vol			
a. X RQ HAZARDOUS WASTE, SOLID, N.O.S. 9 NA3077 PG III (FO03)(ERG#31)						0/6 DM		074/72		P		FO03 DO07	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
FO03 DO08						S01/T50							
15. Special Handling Instructions and Additional Information 4-145-03-7218 PP/M66574 IF UNDELIVERABLE RETURN TO GENERATOR EMER RESP#708-888-4660 24HR SAMPLE#320759 CTL#0181831-3 SKDOT#A: 1195													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name JIM HOWELL						Signature Jim Howell				Date 08/13/93			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature John A Schutz				Date 08/13/93			
Printed/Typed Name JOHN A SCHUTZ						Signature John A Schutz				Date 08/13/93			
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature				Date			
Printed/Typed Name						Signature				Date			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name Ellen Hamlin						Signature Ellen Hamlin				Date 08/17/93			

**CUSTOMER**

MANIFEST NUMBER	66574
-----------------	-------

8-1-8

CUSTOMER NUMBER \_\_\_\_\_

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY/STATE \_\_\_\_\_ ZIP \_\_\_\_\_

SERVICE DATE	SALESMAN'S NO.	SALES SPECIALIST	CUSTOMER P.O. NUMBER	SALES TAX EXEMPTION NO.	SERV. TAX %	C.O.M.S. TAX %	PROD. TAX %	SVC - P/S	PROD. P/S
8/13/92	3131								

## MACHINE SERVICE SECTION

USED MANUAL ORDER BECAUSE:

MACHINE NUMBER	SERVICE CHARGE	SALES TAX	TOTAL CHARGE	SERVICE TERM (WEEKS)	CHANGE SERVICE TO (WEEKS) "INITIAL"		REMARKS
<i>Smpt#</i>	<i>320759</i>						
<i>CTL#</i>	<i>0181831-3</i>						
TOTAL SERVICE SECTION				GENERATOR US EPA ID NO.		GENERATOR STATE ID NO.	SPENT SOLVENT MEETS ACCEPTANCE CRITERIA YES NO
				<i>VV0000787730</i>			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

and in 1999, blood lead levels in children in the 44-49 age group were 1.9% below the 1990 level.

CONTAINERS					"This is to certify that the below-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation."	I certify that my total waste streams are within one of the following categories:
PAILS NO. DM	SSPW TANKS OF	15 GAL NO. DM	30 GAL NO. DM	TOTAL LBS. OR GAL	US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)	0 to 220 LBS./MONTH <div>Initials</div>
					Waste Petroleum Naphtha, Combustible Liquid, UN1255 (EPA, D001, D018, D039) (ERG #27)	
					RQ Waste Compound, Cleaning, Liquid Corrosive Material, NA1760 (EPA, F002, F004, D006, D007, D008, D022) (ERG #60)	220 LBS. to 2,200 LBS./MONTH <div>Initials</div>
					RQ Waste Compound, Cleaning, Liquid Corrosive Material, NA1760 (EPA, D006, D007, D008, D018, D021, D027, D039, D040) (ERG #60)	GREATER THAN 2,200 LBS./MONTH <div>Initials</div>

Total Quantity = Number of Drums x Ave. Wt/Drum of:	Pails	SSPW TANKS	16 Gal.	30 Gal.
---	-------	---------------	---------	---------

DESIGNATED FACILITY NAME AND ADDRESS:

DESIGNATED FACILITY NAME AND ADDRESS:  
Safety Klean Corp. State Hwy 146, New Castle, Ky 40050

USA EPA ID No. *KY0053345108*  
STATE ID No.

FOR OFFICIAL USE ONLY  
 FORM 104-1 (Rev. 10-1-68) PREPARED BY THE SALES SECTION, BUREAU OF INDIAN AFFAIRS

PRODUCT NUMBER	DESCRIPTION	MSDS GIVEN	DEALER PRICE	UNIT OF MEASURE	QUANTITY DELIVERED	SALES AMOUNT	TAX	LINE TOTAL
82114	Drum 5	<input type="checkbox"/>	695 <sup>00</sup>	EA	16	11,120. <sup>00</sup>	00	11,120. <sup>00</sup>
		<input type="checkbox"/>						
		<input type="checkbox"/>						
		<input type="checkbox"/>						
		<input type="checkbox"/>						

1. THE STATE OF TEXAS

<b>CASH</b> <input type="checkbox"/> <b>CHECK NUMBER</b>	<b>TOTAL RECEIVED</b>	<b>APPLY PAYMENT TO:</b> <input type="checkbox"/> <b>TODAYS SERVICE/SALE</b> <input type="checkbox"/> <b>PREVIOUS BALANCE AS FOLLOWS</b>
---	-----------------------	--

INV. # _____	AMOUNT \$ _____
INV. # _____	AMOUNT \$ _____
INV. # _____	AMOUNT \$ _____

### TOTAL PRODUCT AMOUNTS

**TOTAL SERVICE AMOUNT (FROM ABOVE)**

CHARGE MY ACCOUNT FOR THIS TRANSACTION  
UNLESS OTHERWISE INDICATED IN THE PAYMENT  
RECEIVED SECTION. ALSO I HAVE NOTED THE  
PRESENCE OF MACHINE, SOLVENT, AND  
RECLAMATION AGREEMENT INFORMATION ON THE  
REVERSE SIDE.

**TOTAL DUE** 11/20/00

INVOICES ARE SUBJECT TO AN INTEREST CHARGE OF THE LESSER OF 1%% PER MONTH (18% PER ANNUM) OR THE MAXIMUM RATE ALLOWED BY LAW ON ANY UNPAID INVOICES THAT ARE NOT PAID WITHIN 30 DAYS.

IN THE EVENT OF DEFAULT, SAFETY-KLEEN SHALL BE ENTITLED TO RECOVER COSTS OF COLLECTION INCLUDING REASONABLE ATTORNEY'S FEES.

*Xin Huell*  
GENERATOR/DESIGNATED REPRESENTATIVE SIGNATURE

PRINT NAME T.M. HOWELL

PART NO. 1322 (REV. 1/91)

**IN EVENT OF EMERGENCY CALL  
1-800-669-5740 or 1-708-888-4660 (24 hours)**

7-1026 OF 1-800-999-9333 FOR IMPORTANT INFORMATION

TO: SAFETY-KLEEN CORP

EPA ID NO:

KYD053348108

STATE HWY 146

NEW CASTLE

KY 40050

Under manifest number 66574 line number 11A (enter 11a 11b, 11c, OR 11d) the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA WASTE CODES: F003 D007 D006 D008

## F001-F005 Spent Solvents

## TREATMENT STANDARDS (total mg/l, except as noted by TCLP)

Regulated Hazardous Constituent	Wastewater W/Solvents	Check All That apply	All Other Solvent Wastes	Check All That Apply
Acetone	0.28	_____	160	_____
Benzene	0.07	_____	3.7	_____
N-Butyl alcohol	5.6	_____	2.6	_____
Carbon disulfide	0.014	_____	4.8	TCLP _____
Carbon tetrachloride	0.057	_____	5.6	_____
Chlorobenzene	0.057	_____	5.7	_____
Cresol (m- and p-isomers)	0.77	_____	3.2	_____
o-Cresol	0.11	_____	5.6	_____
Cyclohexanone	0.36	_____	0.75	TCLP _____
o-Dichlorobenzene	0.088	_____	6.2	_____
Ethyl acetate	0.34	_____	33	_____
Ethyl benzene	0.057	_____	6.0	_____
Ethyl ether	0.12	_____	160	_____
Isobutyl alcohol	5.6	_____	170	_____
Methanol	5.6	_____	0.75	TCLP _____
Methylene chloride	0.089	_____	33	_____
Methylene chloride(from Pharm. Industry)	0.44	_____	33	_____
Methyl ethyl ketone	0.28	_____	36	_____
Methyl isobutyl ketone	0.14	_____	33	_____
Nitrobenzene	0.068	_____	14	_____
Pyridine	0.014	_____	16	_____
Tetrachloroethylene	0.056	_____	5.6	_____
Toluene	0.08	_____	28	_____
1,1,1-Trichloroethane	0.054	_____	5.6	_____
1,1,2-Trichloroethane	0.03	_____	7.6	_____
1,1,2-Trichloro-1,2,2-trifluoroethane	0.057	_____	28	_____
Trichloroethylene	0.054	_____	5.6	_____
Trichloromonofluoromethane	0.02	_____	33	_____
Xylenes (total)	0.32	_____	28	X _____

## California List Prohibited Wastes

## Level (mg/l)

## Treatment Standard

Halogenated Organic Compounds

1000.0

Incineration\*

Nickel (Ni)

134.0

None

\* These treatment standards do not preclude solvent recovery or use as fuel prior to land disposal.

Thallium (Tl)

130.0

None

Chlorinated Biphenyls (PCB's)

50.0

Incineration

## Waste Descriptions and/or Treatment Subcategory

## Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)

## Check All That Apply

Waste code	Description	Wastewaters	Nonwastewaters	Check All That Apply
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT _____	NA	_____
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT _____	_____
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, OR INCIN _____	_____
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT _____	268.42(a) DEACT _____	_____
D004	Arsenic(As)	268.43(a) _____	268.41(a) _____	_____
D005	Barium (Ba)	268.43(a) _____	268.41(a) _____	_____
D006	Cadmium (Cd)	268.43(a) _____	268.41(a) _____	X _____
D007	Chromium (Cr)	268.43(a) _____	268.41(a) _____	X _____
D008	Lead (Pb)	268.43(a) _____	268.41(a) _____	X _____
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a) _____	268.41(a) _____	_____
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a) _____	268.42(a) RMERC _____	_____
D010	Selenium (Se)	268.43(a) _____	268.41(a) _____	_____
D011	Silver (Ag)	268.43(a) _____	268.41(a) _____	_____
F005	2-Ethoxyethanol	268.42(a) INCIN* _____	268.42(a) INCIN* _____	_____
F005	2-Nitropropane	268.42(a) INCIN* _____	268.42(a) INCIN* _____	_____
Other Codes See attachment for supplemental list		_____	_____	_____

This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45 for the above contaminants that are subject to treatment.

(check if applicable)

Generator Name: WHEELING PITT STEEL

EPA ID: WVD000797720

Generator Signature: Jim HowellName & Title: JIM HOWELL Supt. W.C.C. ENVIRONMENTAL

Safety-Kleen Sample Number: 320759

Control Number: 0181831-3

NOTE: The USEPA has not determined treatment standards for the new TCLP EPA Waste Numbers: D018 through D043.



ATTACHMENT F-1

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 8550

Harrisburg, PA 17105-8550

OFFICIAL PENNSYLVANIA MANIFEST FORM

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS  
AND CHEMOTHERAPEUTIC WASTE

Form approved

OMB No. 2050-0039

Expires 9-30-92

ER-WM-51 REV. 1/91

UNIFORM HAZARDOUS  
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest  
Document No.2. Page 1  
of 1Information in the shaded areas  
is not required by Federal law  
but is required by State law.3. Generator's Name and Mailing Address **Wheeling-Pittsburgh Steel Corp**  
**Route 2**  
**Beech Bottom, WV 26030**A. State Manifest Document Number  
**PAC 7843813**

4. Generator's Phone (304) 234-2685

B. State Gen. ID

5. Transporter 1 Company Name  
**Petroclean, Inc.**

6. US EPA ID Number

**P A D 0 9 8 4 3 1 8 8 5**

C. State Trans. ID

**PA- A H 10109**

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (412) 279-9556

9. Designated Facility Name and Site Address

10. US EPA ID Number

**Petromax, Ltd.**  
**301 Prestley Street**  
**Carnegie, PA 15106****P A D 9 8 2 6 8 4 4 5 8**

E. State Trans. ID

**PA- A H 10109**

F. Transporter's Phone (412) 279-9556

G. State Facility's ID

H. Facility's Phone (412) 279-9040

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No. Type

13. Total  
Quantity14. Unit  
Wt/Vol

Waste No.

a. **RQ, Waste Gasoline, 3, UN1203, PGII****D M****G****D 0 1 6**  
**D 0 0 1**b. **RQ, Combustible Liquid, n.o.s. (diesel fuel), 3, NA1993**  
**PGIII****003****n y****00165****n****N O N E**

J. Additional Descriptions for Materials Listed Above

Lab Pack

Physical State

Lab Pack

Physical State

K. Handling Codes for Wastes Listed Above

a. ☐ **L** ☐ **I**c. ☐☐b. ☐c. ☐b. ☐d. ☐☐b. ☐d. ☐

15. Special Handling Instructions and Additional Information

Material is gasoline and water from UST closure.

Material is diesel fuel and water from UST closure. (Not RCRA regulated).

EMERGENCY RESPONSE GUIDE #27

In case of emergency contact Petroclean, Inc. (24hrs) 412/279-9556.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

**JIM HOWELL**

Signature

**Jim Howell**

MONTH DAY YEAR

**07 07 93**

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

**Gerald Ambler**

Signature

**Gerald Ambler**

MONTH DAY YEAR

**07 07 93**

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

MONTH DAY YEAR

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

**Ed Nelson**

Signature

**Ed Nelson**

MONTH DAY YEAR

**07 07 93**

July 7, 1993

Mr. Kent Hart  
Petromax, Ltd.  
301 Prestley Street  
Carnegie, PA 15106

Re: Land Disposal Restrictions

Wheeling-Pitt Steel Corporation

Dear Mr. Hart:

This is to notify you, pursuant to 40 CFR 268.7(a)(1), that the waste referenced below, shipped on manifest number PAC 7643813 is subject to land disposal restrictions specified at 40 CFR Part 268.

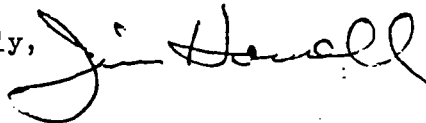
Manifest Line EPA Waste Code Treatability Group Standard Reference

11a D001 Ign Liq TOC>10% FSUBS 268.42 Table2

I believe this waste, and any residues resulting from the management of this waste, require treatment to meet applicable standards as set forth in 40 CFR Part 268, Subpart D, prior to land disposal. Applicable treatment standards are referenced above.

It is your responsibility to assure management of this waste is in compliance with all applicable conditions and restrictions imposed by law and regulation.

Sincerely,

 7-7-93

HAZARDOUS WASTE TRAINING  
CONDUCTED BY CLEAN HARBORS

470612

LONG COURSE - NOV 17, 1993 - 9:00 AM - 1:00 P.M.

✓ WAYNE WILSON	COIL COATING
✓ RICH ROY	" "
VICTOR STERLING 11515	"OFF on sick leave
✓ MARK O'LEARY	MAINTENANCE
✓ ERIC CHRONISTER	"
✓ JIM ROTH 11488	"
✓ RICK SNYDER 15476	"
✓ BOB WINESBURG 12748	"
SMITTY MYERS	LABELLE

270612

SHORT COURSE - NOV. 19, 1993 - 1:00 PM - 3: PM.

BRIAN JONES	COIL COATING
ED SAMBUCCO	" "
ETHEL REID ok	PLANT PROTECTION
DOMINIC MORANDO ok	" "
GEORGE MANNING ok	" "
MEL DICKENSON ok	" "
LEON FALCON Worked 8-4	" "
ED LISH 11486	MAINTENANCE
BOB GLOVER 12680	"
COATER ATTENDANTS	COIL COATING
UTILITY PERSONNEL	COIL COATING

## HAZARDOUS WASTE Mtg

② HR Refresher

Beach Bottom Plant 11/19 - 1:00pm

NameSignature

1	Hugh Whitehead <sup>15783</sup> ✓	Hugh A Whitehead
2	RAYMOND L. TONER <sup>15897</sup> ✓	Raymond Toner
3	GEORGE MANNING <sup>ch</sup> ✓	George M. Manning
4	Ethel Reed ✓	Ethel Reed
5	John Lemons <sup>15467</sup> ✓	John E. Lemons
6	MEL DICKINSON ✓	Mel Dickinson
7	Ed Lish <sup>11486</sup> ✓	Ed Lish
8	DOMINIC MORANDO JR ✓	Dominic Morando Jr.
9	GARY R. LYNCH <sup>12584</sup> ✓	Gary R. Lynch
10	RUSS NEFF <sup>12282</sup> ✓	Russ Neff
11		
12		
13		
14		
15		

**WHEELING-PITTSBURGH STEEL CORPORATION**  
**BEECH BOTTOM PLANT**  
**HAZARDOUS WASTE CONTINGENCY PLAN**

REVISIONS - APRIL 8, 1992

***Hazardous Wastes***

The hazardous wastes at the Beech Bottom Plant are hazardous because of flammability and/or toxicity.

Hazardous wastes are generated at the coil coating line and include scrap paint, spent solvent/paint mixtures, solvent/paint contaminated wiping rags, solvent/paint cartridge or bag filters, and rubber drum lid gaskets. In addition, spills of a chromium containing solution used on the coil coating line are absorbed with "Floor-dry" and are managed as a toxic hazardous waste. These wastes are accumulated in 55-gallon steel drums near the coil coating line. When filled, the drums are sealed and moved to Building 15 for temporary storage for eventual off-site disposal. Building 15 is located at the south end of the Beech Bottom Plant and is designated as the hazardous waste storage area. The building is constructed with a metal frame, metal siding and metal roof. The building has a dry-pipe sprinkler system. The building is kept locked with keys maintained at the plant patrolman's office.

***Spills***

In the event of a spill of the flammable hazardous wastes, the leaking liquids would be absorbed with an absorbent such as "Floor-dry", picked up and placed in drums for disposal as hazardous waste. Any leaking drums would be inspected and either have the

**BEECH BOTTOM PLANT**  
**HAZARDOUS WASTE CONTINGENCY PLAN**

liquid absorbed in place or have the liquid and other contents transferred to a good drum for eventual disposal.

Spills of the chromium and "Floor-dry" waste and the rags, filters and other waste would be picked up and put back into drums.

Spill control material at the Beech Bottom Plant consists of absorbents ("Floor-dry"), absorbent pads and chips, and absorbent booms. These are stored at various places in the plant. Spill control equipment at the plant consists of shovels and other hand tools which are stored in the maintenance area.

***Fires***

In the event of a fire in the flammable hazardous waste storage area, the building has a dry-pipe sprinkler system for protection. This system has an alarm in the plant patrolman's office. There are portable dry chemical units and foam extinguishers in the buildings adjacent to Building 15 available for fire fighting. There is also a fire hydrant on the west side of Building 15 for fire fighting.

If assistance is required, the Beech Bottom, Short Creek, Windsor Heights and Wellsburg fire departments are available. The Beech Bottom Fire Department has toured the plant. They were shown hydrant locations and the area where the flammable hazardous wastes are stored.

**BEECH BOTTOM PLANT**  
**HAZARDOUS WASTE CONTINGENCY PLAN**

***Emergency Coordinators***

The following emergency coordinators can be reached during business hours by calling 304-234-2683, and after business hours by calling 304-234-7628.

William R. Samples

Thomas J. Waligura

The following Emergency Coordinators are Beech Bottom Plant personnel and can be reached during and after business hours:

<u>Position</u>	<u>Name</u>	<u>Home Address</u>
Plant Manager	S. F. Beecroft Plant phone: Ext. 4275 Home phone: 304-277-2238	25 Warwood Terrace Wheeling, WV 26003
Supervisor, Environmental	J. M. Howell Plant phone: Ext. 4223 Home phone: 304-233-0489	609 N. Erie Street Wheeling, WV 26003
Hazardous Waste Coordinator, Wheeling Corrugating Company	J. F. Allen Plant phone: Ext. 4273 Home phone: 304-232-8929	150 G C & P Road Wheeling, WV 26003
Superintendent, Maintenance & Services	M. W. O'Leary Plant phone: Ext. 4219 Home phone: 304-242-8140	51 Acosta Avenue Wheeling, WV 26003

**BEECH BOTTOM PLANT**  
**HAZARDOUS WASTE CONTINGENCY PLAN**

***Police - Security***

The Beech Bottom Plant has its own security personnel on duty 24 hours per day. If necessary, the Brooke County Sheriff's Department or the Wellsburg Detachment of the West Virginia State Police will be called for assistance.

***Hospitals***

The Beech Bottom Plant has a registered nurse on duty in the Plant Dispensary during weekdays from 7:00 a.m. to 3:00 p.m. Personnel requiring medical attention will be cared for at the in-plant dispensary, if possible, or will be transported to a local hospital.

***Communications***

The Beech Bottom Plant has an FM radio communications system consisting of a base station in the plant patrolman's office and several hand-held mobile units in use by personnel throughout the plant. The patrolman has a citizens' band base station in his office along with telephones.

***Alarms***

The Beech Bottom Plant has several sprinkler systems throughout the plant. Each system has an alarm that is connected to an annunciator panel located in the plant

**BEECH BOTTOM PLANT**  
**HAZARDOUS WASTE CONTINGENCY PLAN**

patrolman's office. If a sprinkler system trips, an alarm sounds and a light on the annunciator panel comes on.

***Emergency Equipment***

The following emergency equipment and/or materials are available at the Beech Bottom Plant:

1. Fire Protection
  - a. Sprinkler system in paint/solvent storage building
  - b. Sprinkler system in hazardous waste storage building
  - c. Portable fire extinguishers located throughout the plant
2. Absorbent Materials
  - a. Absorbent pads stored in the paint/solvent storage building at the wastewater treatment plant
  - b. "Floor-dry" stored in small quantities at various areas along the coil coating line for immediate usage requirements.
  - c. "Floor-dry" in bulk, stored on skids in the south end of Building 8.
  - d. Wiping rags are stored in each coil coating line coater room for use in absorbing spilled paint and normal clean-up of the coating rolls.

**BEECH BOTTOM PLANT  
HAZARDOUS WASTE CONTINGENCY PLAN**

**3. Storage Materials**

- a. These are empty 55-gallon open top steel drums that are normally stored outside the south end of Building 8.

**4. Tools**

- a. Hand trucks are available at the coil coating line coater room, from the plant storeroom, and from the maintenance tool storage area for use in transporting drums of materials.
- b. Shovels are available at the maintenance tool storage area for use in picking up spilled materials and absorbents.

***Evacuation***

The hazardous wastes at the Beech Bottom Plant are stored in areas outside the main plant buildings. Evacuation from Building 15 will be north into and through the main plant, or east, west and south into the open field area surrounding Building 15.

Except for personnel directly involved with any clean-up or fire fighting activity, other plant personnel would be kept out of the area.

***State Emergency Response Teams***

The Emergency Coordinators previously listed will make any necessary contacts to the State Emergency Response Teams and the Local Emergency Planning Committee (Brooke County Sheriff's Office).

**BEECH BOTTOM PLANT**  
**HAZARDOUS WASTE CONTINGENCY PLAN**

***Traffic Pattern, Volume and Control***

Shipments of hazardous waste from the Beech Bottom Plant are by truck. Only one shipment occurs at a time, and the plant is not confined in terms of the area. Traffic control is considered unnecessary.

JFA/vll  
c:\data\wper\hazwaste.92